

JAA Doe, The Plaintiff
Case No.: 1:24-cv-00345 AT
99 Walls Street #5789
631-980-2205

VIA Email ***Pro Se***

Honorable Analisa Torres
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2210
New York, New York 10007-1312
Torres_NYSDChambers@nysd.uscourts.gov

May 10th, 2024

Response to Jeff Anderson's 'Motion and Motion to Withdraw as Counsel'

Docket: Doe v. Portnow, et al., 24 Civ. 345 (AT)

Dear Judge Torres:

I am writing to bring an urgent matter to your attention regarding my case 1:24-cv-00345 AT. As a *pro se* litigant, I find myself in an erratic situation due to the actions of Jeff Anderson and defendants motions to respond to my voluntary dismissal request. Jeffrey Anderson's dual motions and affirmation in support of the motion jeopardizes my urgent need for dismissal without prejudice. **I deny Jeffery Anderson's Motion 2 to extend any impending deadline to a later date sufficient to permit my new counsel, and Jeff Adnerson's affirmation request Brief extension of deadlines.** Jeff Anderson's double actions have caused emotional trauma and fear, compromising my interests. I seek the court's acknowledgment of my desire and right to end the proceedings. **I urgently request the court's consideration for dismissal of my case without prejudice.**

Safety Concerns and Contradictory Behavior

Since April 25th, Jeff Anderson kept expressing serious concern and care for my safety, especially regarding the potential further harm and my emotional well-being for both me and himself, as well as regarding the case proceedings. In the lack of transparency, his resignation and his subsequent actions, the dual motions and affidavit filed has left me perplexed and fearful.

Contradictory Dual Motion : Withdrawal but Attempting Case Continuation

Jeff Anderson filed a dual motion, and his affirmation in support of motion indicating his intention to resign while simultaneously requesting the court to continue the case asking permit new counsel for me ignoring my voluntary dismissal on May 4th. It is the same pattern that he withdrew his representation May 1, but he kept control of my case through making excuses to find a new lawyer without being involved in the court for 30 days within the very urgency as he advised in the meeting April 25. I haven't asked him to ask the court for permitting time to find a new lawyer. The conflicting motions filed by Jeff Anderson have caused confusion and compromised my interests. It has exacerbated my emotional distress.

1) Jeff Anderson Motion 1 for Withdrawal as counsel

*PLEASE TAKE NOTICE that, upon the accompanying Declaration of Counsel, the law firm of Jeff Anderson & Associates, respectfully moves for an Order permitting it to **withdraw as counsel for Plaintiff**, pursuant to Local Civil Rule 1.4.- May 6, 2024, Motion and Motion to withdraw as counsel*

2) Jeff Anderson Motion 2 for Extension of time

*Further, we respectfully request that the Court **extend any impending deadlines to a later date sufficient to permit new counsel** for Plaintiff to make appropriate filings or appearances. –May 6, 2024, Motion and Motion to withdraw as counsel*

3) Jeff Anderson Affirmation No.12 for Brief extension of deadlines

***A brief extension of impending deadlines** will sufficiently address any prejudice to Plaintiff caused by withdrawal without inviting substantial delay to the proceedings. – May.6, 2024, Affirmation of Jeffrey R. Anderson in support of motion to withdraw as counsel*

Conflicting Interests

On May 4th, I urgently requested voluntary dismissal because of my inability to proceed with the case. However, May 6th, Jeff Anderson's actions seemed to align more with the defendant's interests than his client, JAA Doe, me. The two defendant's similar motion to extend time for case continuation further confirms the alignment of their interests on May 7th. This conflict of interests has put me in an untenable position and panic, his dual motions appeared contrary to his client, me JAA Doe.

1) Defendant motion, National Academy of Recording Arts & Sciences, on May 7th:

*We respectfully request that the Court allow us until Tuesday, May 14, 2024 to provide the Recording Academy's position with respect to Plaintiff's request and **that the Court take no action prior thereto.** Additionally, we respectfully request that this **Court stay the pending deadlines in the interim,** specifically, the **May 13, 2024 deadline** to file a joint letter, proposed case management plan, and whether the parties consent to proceed before a magistrate judge.*

2) Defendant motion, Neil Portnow, on May 7th:

*Specifically, we request that the Court allow us until Tuesday, May 14, 2024, to provide Mr. Portnow's position with respect to Plaintiff's request and that the **Court take no action regarding that application prior to that date.***

*Furthermore, we respectfully request that the **Court stay the pending deadlines in the interim, specifically, Mr. Portnow's May 9, 2024 deadline to answer the Amended Complaint and the parties' May 13, 2024 deadline** to file a joint letter, proposed case management plan, and indication of whether they consent to proceed before a magistrate judge. –May 7, 2024*

I haven't given him my power to work for my interest, not for the defendants'. It is impossible to trust his work for 6 months. I fear further harm and for my safety and well-being indeed.

In Conclusion

I deny Jeffery Anderson's Motion 2 to extend any impending deadline to a later date sufficient to permit my new counsel, and Jeff Adnerson's affirmation's request Brief extension of deadlines. My interests are best served by dismissal for my safety and in this emotional distress in urgency. Jeff Anderson should've known this, but he didn't support my interest, right rather aligned with defendants. The defendant's similar motion to extend time for case continuation further confirms the alignment of their interests on May 7th. Jeff Anderson's actions have caused emotional trauma and fear, compromising my interests, has left me feeling unsupported and deceived. My emotional well-being and interests are not adequately represented.

Therefore, Jane Doe requests expedited approval for the dismissal of the case without prejudice because of privacy concerns, attorneys sudden withdrawal, safety concerns, urgency, emotional well-being. I urgently request the court's consideration for dismissal of my case without prejudice. I am unable to proceed with case proceedings. I seek the court's acknowledgment of my desire and right to end the proceedings. **I urgently request the court's consideration for dismissal of my case without prejudice.**

Sincerely, yours
s/JAA Doe

JAA Doe,
The Plaintiff
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